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May 11, 2012

## **VIA ELECTRONIC FILING**

Honorable Lois Bloom  
United States Magistrate Judge  
U.S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: United States v. Jean-Pierre Neuhaus and Roland Kaufmann**  
12-MJ- 00237

Dear Magistrate Judge Bloom:

We represent defendant Roland Kaufmann in connection with the above-captioned matter. Mr. Kaufmann was released on bail on March 27, 2012, following satisfaction of the conditions set by Magistrate Judge Steven M. Gold's Order Setting Conditions of Release and Bond, dated March 14, 2012. As a condition of his bail, Mr. Kaufmann is subject to home detention with electronic monitoring.

Mr. Kaufmann respectfully requests that his bail conditions be modified to permit him to use the gym facilities located in the basement of the apartment building in which he resides in order to exercise for health-related reasons. Mr. Kaufmann takes prescription medication for a heart condition and has high blood pressure, and it would benefit his health to use the gym's cardio equipment several times per week. Mr. Kaufmann respectfully requests that the Court grant him permission to leave his apartment three times per week for one hour as determined by Pretrial Services so that he can use his building's gym facilities.

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Mr. Kaufmann further requests that his bail conditions be modified to grant him medical privileges so that he can attend medical appointments as approved by Pretrial Services. Under the current bail conditions, Pretrial Services is authorized to permit Mr. Kaufmann to leave his apartment only for medical emergencies, not for non-emergency medical appointments.

We have consulted with the Government and with Pretrial Services, and both have informed us that they have no objection to either of Mr. Kaufmann's requests.

We thank Your Honor for your consideration of this matter.

Respectfully submitted,

/s/ Eric J. Snyder

Eric J. Snyder

/s/ Josef M. Klazen

Josef M. Klazen

cc: N. Nathan Dimock, U.S. Department of Justice (via e-mail)  
Justin Goodyear, U.S. Department of Justice (via e-mail)  
Shannon Jones, Assistant United States Attorney (via-e-mail)  
Anna Lee, U.S. Pretrial Services (via-e-mail)